

			procedures for provisioning Unbundled Network Elements (UNEs).
23	59	4/10/00	BellSouth's ordering documentation does not define rules for submission of batched orders.
24	60	4/12/00	BellSouth does not deliver timely Functional Acknowledgements (FAs) via Electronic Data Interchange (EDI).
25	67	4/26/00	BellSouth does not deliver timely Missed Appointment (MA) notices via the EDI and TAG interfaces.
26	68	4/21/00	BellSouth does not provide complete Firm Order Confirmation (FOC) and Completion Notice (CN) responses.
27	69	4/26/00	BellSouth does not deliver timely Jeopardy Notifications via the EDI and TAG interfaces.
28	72	4/26/00	BellSouth does not have a clear process for delivering Jeopardy and Missed Appointment notifications.
29	75	4/12/00	BellSouth's <i>Local Exchange Ordering Guide, Volume 1, Version 7N (LEO Guide)</i> omits definitions for certain BellSouth ordering responses.
30	76	3/30/00	KPMG encountered numerous BellSouth provisioning errors for Unbundled Network Element (UNE) orders.
31	77	5/9/00	BellSouth does not deliver timely fully mechanized Clarification (CLR) responses.
32	78	5/9/00	BellSouth does not deliver timely Firm Order Confirmation (FOC) responses to flow through local service requests (LSRs).
33	80	5/9/00	BellSouth guidelines for submitting an order Service Inquiry (SI) and Loop Service Requests (LSR) do not provide complete, consistent information.
34	82	5/10/00	BellSouth Central Office (CO) technicians and Unbundled Network Element Center (UNEC) coordinators do not adhere to BellSouth's methods and procedures for provisioning coordinated hot-cuts.
35	95	6/21/00	BellSouth has delivered Firm Order Confirmations (FOC's) in response to Local Service Requests (LSRs) that should have received error messages.
36	97	6/28/00	BellSouth does not deliver timely Firm Order Confirmation (FOC) responses to non-flow through local service requests (LSRs). -See also ER #78
37	98	6/21/00	BellSouth does not deliver timely partially mechanized Clarification (CLR) responses
38	102	7/18/00	BellSouth is unable to mechanically process telephone number changes for lines with measured classes of service 1MBGE.
39	106	8/10/00	BellSouth failed to meet the agreed upon frame due time for eight loop migrations
40	108	7/18/00	Parity does not exist between BellSouth's CLEC xDSL ordering process and its retail xDSL ordering process. (BellSouth Internet Services)
41	112	9/27/00	No process for returning acknowledgements or tracking manually submitted Loop makeup Service Inquiry pre-order queries or LSRs Service Inquiries
42	114	10/02/00	KPMG encountered BST provisioning errors for resale orders.
43	115	10/03/00	BST does not respond to loop make-up service inquiries within the specified seven day interval.
44	117	10/12/00	BST does not provide a clarification/rejection response to a Loop Make Up service inquiry within the expected 7 day interval.
45	118	11/14/00	KPMG did not receive completion notices within one business day of expected service completion.
46	121	01/05/01	BST's manual ordering documentation does not contain references to decline CLEC requests to Related Purchase Order Number designed with non-designed services.

47	125	12/18/00	BellSouth's process for generating completion dates for LSRs may result in inaccuracies between the completion date provided to the CLEC and the actual date of service completion.
48	126	12/18/0	BellSouth's provisioning completion activities for xDSL orders are not consistent with the confirmation due date provided on the FOC.

			<b>Billing</b>
1	16	2/10/00	BellSouth issued multiple bills containing erroneous information to the KPMG CLEC.
2	27	2/14/00	BellSouth provided incorrect DUF records to KPMG.
3	28	2/14/00	BellSouth failed to deliver 46% of expected DUF records to KPMG.
4	29	2/15/00	BellSouth did not deliver timely DUF records to KPMG.
5	34	3/10/00	BellSouth's ODUF/ADUF documentation is deficient in the breadth and depth of topical coverage.
6	35	3/14/00	BellSouth issued multiple bills containing erroneous charges to KPMG.
7	73	3/20/00	BellSouth's CRIS/CABS billing documentation is deficient in the breadth and depth of topical coverage.
8	91	5/24/00	(DRAFT) BellSouth incorrectly billed KPMG CLEC for usage charges for messages processed in the Augusta central office.
9	94	6/6/00	BellSouth failed to deliver 20% of expected resale DUF records to KPMG.
10	99	7/6/00	BellSouth issued multiple bills to the KPMG Test CLEC incorrectly identifying recurring changes as non-recurring charges
11	103	7/27/00	The KPMG Consulting Test CLEC received invoices from BellSouth containing inaccurate information.
12	124	11/21/00	BST issued multiple bills that contained incorrectly rated and missing charges.

			<b>Other</b>
1	21	2/15/00 10/24/00	Local Service Requests (LSR's) were improperly categorized for <i>Percent Flow Through Service Request Reports</i> . Re-opened.
2	41	3/21/00	BellSouth does not provide Competitive Local Exchange Carriers (CLECs) with adequate flow through information.
3	48	3/30/00	Minor errors in categorizing LSRs for BellSouth's Flow Through Reports indicate the potential for future, material reporting errors.
4	2	11/12/99	Bell South's change management process does not include clearly defined and reasonable intervals for notifying customers about changes to electronic interfaces and supporting documentation.
5	17	2/4/00	BellSouth's change management process for updating the Interconnection Services Local Exchange Carriers - OSS Information Center Web site allows for defects in postings.
6	30	2/18/00	Bellsouth's change management process does not include a comprehensive mechanism for tracking change information.
7	25	2/14/00	BellSouth's systems capacity management process does not include established ongoing procedures for forecasting business volumes and transactions.
8	109	8/8/00	Formal procedures for managing the capacity of the BST work centers, which perform wholesale (UNE) xDSL pre-order and ordering activities, are not defined and documented.

			<b>Maintenance and Repair</b>
1	6	12/29/99	Multiple instances of inaccuracies in TAFI documentation and deficiencies in distribution of updates have been identified.
2	7	1/5/00	The BellSouth ECTA Gateway does not allow CLEC's to process trouble reports for SL1 circuits.
3	10	1/5/00	Under two circumstances, a TAFI tester was unable to cancel or close a trouble report in the manner described by the <i>CLEC TAFI End-User Training and User Guide</i> .
4	11	1/5/00	The host request error and reset communications functions do not operate as described by the <i>CLEC TAFI End-User Training and User Guide</i> .
5	12	1/5/00	The ECTA Gateway does not accurately notify CLEC's when invalid information is entered into a trouble ticket.
6	13	1/10/00	Numerous undocumented messages intended for BellSouth are generated by TAFI during trouble report creation and processing.
7	14	1/10/00	The BellSouth TAFI application does not allow CLEC's to process trouble reports for ISDN lines as described in the <i>CLEC TAFI End User Training and User Guide</i> .
8	15	2/4/00	Under certain circumstances, BellSouth's ECTA gateway cannot adequately create trouble tickets.
9	36	3/20/00	During TAFI interface testing, KPMG encountered multiple inconsistencies while accessing information in BellSouth's Service Order Communications System (SOCS).
10	37	3/24/00	During the testing of the "supervisor" functions, KPMG was presented with an unfiltered list of all in-session TAFI users.
11	50	4/12/00	In four instances, KPMG was unable to create a link between the "parent" telephone number (TN) and the "child" TN during TAFI multiple trouble report (MTR) testing.
12	20	2/14/00	BellSouth technicians cannot initiate a Verify Repair Completion request.
13	81	5/16/00	The ECTA Gateway does not accurately notify KPMG when invalid information was entered into a trouble ticket.
14	85	5/16/00	The BellSouth ECTA Gateway did not automatically request a "Front-end Closeout" on a POTS line that produced negative Mechanized Loop Test results.
15	96	6/13/00	BellSouth ECTA Gateway does not allow CLECs to process trouble reports for PBX circuits in the state of Georgia.

## **Performance Measurement**

### **Data Integrity Issues**

- 1. BellSouth does not report LNP related rejection and FOC performance for one division of AT&T, which includes all hot cuts and hundreds of LNP stand-alone orders.**
- 2. AT&T's data for its UNE-P test indicates significant differences from BellSouth reported data.**
- 3. AT&T's data for hot cuts indicates significant differences from BellSouth reported data.**
- 4. BellSouth's OSS Availability report indicates nearly perfect performance, while its outage report on its change control web-site indicates numerous outages (New exception in Georgia on this issue)**
- 5. Open exceptions remain in Georgia on data integrity; this test is just getting started in Florida.**
- 6. Data does not match between CLEC aggregate and product disaggregation on the flow-through report. Flow-through report indicates orders submitted via TAG by AT&T, but we have no TAG interface.**
- 7. BellSouth's own reports do not match for AT&T reported data.**

## **Item 2.—Data Integrity**

### **Summary of UNE-P Test Differences**

#### **BellSouth PMAP data compared to AT&T captured data**

#### **November Results**

##### **1. Local Service Request – (LSR) Comparison**

2015 in BellSouth raw data

8 in BST data and not found in AT&T captured data

577 in AT&T captured data and not found in BST data

##### **2. Firm Order Confirmation Comparison (FOC) Comparison**

1596 FOCs in BST raw data

14 in BST data but not in AT&T data

778 Confirmations found in AT&T captured data but not in BellSouth raw data

##### **3. Reject Comparison**

313 rejections in BellSouth raw data

6 in BST data but not in AT&T data

79 rejects found in AT&T data but not in BellSouth data

##### **4. Completion Notices**

803 completion notices in BST raw data

1608 completion notices in AT&T captured data

### Item 3. Data Integrity

#### Example of Hot Cut Data Issues

#### December Data for Florida and Georgia

Hot Cut Volumes	AT&T Captured Data	BST Raw Data	BST Raw Data with exclusions applied	% Difference
Florida	338	285	237	30%
Georgia	89	88	75	16%

## Item 7 – Data Integrity

**BellSouth's performance reports do not match for AT&T reported data.**

Data Area (Paired areas should match)	UNE-P	ADL- LNP	"TCG"- LNP	TCG- UNE	B'band Ga.	B'band GA LNP
# LSRs submitted --% reject—mechanized	<b>Match</b>	No match	No data provided	<b>Match</b>	<b>Match</b>	No match
# LSRs submitted Flow-through report	<b>Match</b>	No match	No match	<b>Match</b>	<b>Match</b>	No match
# Fully mechanized rejections	No match	0	No data provided	No match	<b>Match</b>	No match
# Auto clarifications – flow-through report	No match	0	No match	No match	<b>Match</b>	No match
# Partially Mechanized rejections	No match	No match	No data provided	No match	<b>Match</b>	No match
# CLEC caused fall-out-Flow-through report	Match	No match	No match	No match	<b>Match</b>	No match
# Fully Mechanized FOCs	<b>Match</b>	No match	No data provided	No match	<b>Match</b>	No match
# Issued Service Orders-Flow-through report.	<b>Match</b>	No match	No match	No match	<b>Match</b>	No match
# completed orders from Missed Appointments metric	N/A	No match	No match	N/A	N/A	No match
# completed orders from LNP Disconnect metric	N/A	No match	No match	N/A	N/A	No match

Data Area (Paired areas should match)	UNE-P	ADL- LNP	"TCG"- LNP	TCG- UNE	B'band Ga.	B'band GA LNP
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# completed orders from Missed Appointments metric	No match	No match	No match	No match	N/A	No match
# completed orders from Completion Notice raw data files	No match	No match	No match	No match	N/A	No match

# completed orders from Missed Appointments metric – UNE w/LNP	N/A	N/A	No match	N/A	N/A	NA
# completed orders from Hot Cut Timeliness Metric raw data	N/A	N/A	No match	N/A	N/A	N/A



## Key Remedy Plan Deficiencies

1. The Plan allows a large number of CLEC customers to receive an unacceptable quality of service without BellSouth being classified as out of compliance or being required to pay a remedy.

The plan calls for .50 for individual CLECs and .35 for the CLEC aggregate. AT&T proposes .25.

p(ILEC)	DELTA			
	.250	.350	.500	1.000
1	5.0	7.4	11.8	31.9
2	7.0	9.7	14.6	35.8
3	8.7	11.7	16.9	39.0
5	11.8	15.2	21.0	44.0
10	18.7	22.7	29.3	53.6
15	24.9	29.4	36.4	61.1
20	30.8	35.5	42.8	67.4

2. Even when BellSouth is determined to be in violation of performance standards for a transaction, the statistical methodology allows BellSouth to avoid paying remedies on a large number of transactions.

CLEC							
Cell	CLEC	Missed	Truncat	Balancing	Parity	Volume	Affected
	Volume	Volume	ed Z	Critical Value	Gap	Proportio n	Volume
1	150	17	-1.994				8
2	75	8	0.734				
3	10	4	-2.619				2
4	50	17	-2.878				8
5	15	2	1.345				
6	200	26	0.021				
7	30	7	-0.600				3
8	20	3	-0.065				2
9	40	9	-0.918				4
10	10	3	-0.660				2
Total	600	96					29
State			-1.92	-0.21	1.71	0.4275	

Note. In previous filings, this same illustration was used and resulted in an affected volume of 15. Some items such as volume proportion and balancing critical value have arbitrarily and inappropriately changed, without justification, thereby indefensibly reflecting a different affected volume.

**3. The Plan's performance measures and disaggregation are inadequate.**

**Examples of measures not included:**

**Partially and non mechanized rejections  
LNP and FOC rejections  
Mean Held Order Interval  
% Orders Given Jeopardy Notice Interval  
Average Completion Notice Interval  
Average Recovery Time for Cuts  
Average Answer Time  
Mean Time to Deliver Usage  
Collocation Average Arrangement Time  
Collocation Average Response Time  
Date base update interval  
Service Order Accuracy**

**Also, see requested measures above which were not adopted.**

**Disaggregation is at too high a level and masks discrimination.  
Further, retail analogs not identified in order for some types of  
disaggregation.**

## **Key Performance Measurement (SQM) Deficiencies**

- 1. BellSouth Compliance with Commission's Order**
- 2. Issues with Commission's Order:**

### **--Missing Measures**

#### **Examples:**

**On Time Performance for Hot Cuts  
% xDSL loops successfully tested  
% Troubles not working when initially provisioned  
% Completion of Loop Modification  
Software problem resolution timeliness  
% Billing errors not corrected in X days  
Timeliness of BST Response for BST to CLEC Trunks**

### **--Discriminatory business rules and calculations**

#### **Examples:**

**Held Order Interval  
Flow-through report  
Invoice Accuracy  
Coordinated Cut-over Timeliness  
Order Completion Interval  
Completion Notice Interval  
Missed Appointments**

### **--Low thresholds for benchmarks**

**85% for FOC and rejections  
85% for Flow-through**

# **BellSouth Change Control Process Compliance**

**BellSouth retains a veto power over all decisions:**

**BellSouth's implementation of new software is regularly flawed:**

**BellSouth and CLEC initiated change requests receive disparate treatment as BellSouth regularly ignores CCP requirements:**

**BellSouth does not consistently follow the CCP requirements for the reporting of interface outages:**

# **BellSouth Change Control Process Compliance**

## **BellSouth retains a veto power over all decisions:**

- BellSouth overrides CLEC prioritizations.
- BellSouth's internal processes are being revised and will require revision of the CCP. BellSouth has not proactively provided CLECs with information on the changes to its internal processes or sought CLEC input for use in developing its new processes.
- BellSouth retains and exercises veto power over CLEC consensus decisions to modify the process and implements modifications it desires unilaterally.
- The CCP Document contains a dispute resolution process however no regulatory body has adopted or taken recognition of the document or established any specific processes to handle such disputes.
- BellSouth's new interfaces brought on-line since the initiation of the CCP in April/May 1998 have not been included in the process, but where addressed by BellSouth formed ad hoc groups.
  - These include TAG, the LNP Gateway and the xDSL Corporate Gateway.
  - In each case the functionality delivered has not meet CLEC needs and vital process measurement data for the new interface/process has been unavailable.

## **BellSouth's implementation of new software is regularly flawed:**

- Immediate defect correction was necessary following the implementation of releases 7.1, 8.0, and 9.0.
- Some defects are still open following the implementation of 8.0 and 9.0.
  - The electronic ordering functionality for OS/DA supposedly implemented in 8.0 is still not available.
  - The enhancements to Loop Make-up Inquiry responses supposedly implemented in 9.0 are only available in selected areas.
- There is no pre-release test bed available to CLECs in BellSouth and the BellSouth process does not include an industry Go/No Go decision process to preclude premature implementation.

## **BellSouth and CLEC initiated change requests receive disparate treatment as BellSouth regularly ignores CCP requirements:**

- In 2000, after submitting no change requests in 1998 or 1999, BellSouth became the largest initiator of change requests submitting 41% of all requests.
- The 100 participating CLECs submitted the remaining 59%.
- BellSouth change requests constituted 53% of all implemented requests in 2000.
- 66 BellSouth and 66 CLEC submitted change requests were implemented, scheduled for implementation, or reached pending status in 2000. These numbers represent 67% of all BellSouth submitted change requests, but only 46% of the CLEC submitted requests.

# **BellSouth Change Control Process Compliance**

- 87% of the BellSouth change requests implemented were not submitted to the CLECs for prioritization. 64% were submitted as defects and at least another 13% were implemented outside the existing process.
- At the present there are 24 change requests submitted in 2000 that remain in "new" status. 29% were initiated by BellSouth and 71% by CLECs.
- Requests for a parsed CSR and an electronic process for correcting dropped 411 listings, both of which were submitted and prioritized in September 1999, have yet to be implemented. Five other 1999 CLEC requests will not be implemented until June 30, 2001.

## **BellSouth does not consistently follow the CCP requirements for the reporting of interface outages:**

- See Florida Third Party Exception 12
- Key pre-order/order interfaces continue to be unstable - in February the following outages were reported:
  - LENS 18
  - EDI 2
  - TAG 17
  - CSOTS 5

# BellSouth Change Control Process Compliance

## 1999 CLEC Change Request Disposition at Year End 2000

Submitted	Implemented	Cancelled	Pending	Scheduled
14	5	2	2	5 (Release 9.4, June 30, 2001)

In 1999 BellSouth officially recognized only 14 CLEC change requests. Many areas, including defects were outside the scope of the process. BellSouth submitted no change requests in 1999 however it implemented numerous changes to the interfaces. The two pending change requests Customer Service Record parsing and an electronic process for correcting dropped 411 listings were submitted on September 12, 1999, and have still not been implemented.

## Year 2000 Change Request Disposition at Year End

	Submitted	Implemented	Cancelled	Pending	Scheduled	"New"	Defect
<b>Total</b>	<b>243 (259)</b>	<b>85</b>	<b>69</b>	<b>32</b>	<b>15</b>	<b>25</b>	<b>17</b>
<b>BellSouth</b>	<b>99</b>	<b>45</b>	<b>20</b>	<b>15</b>	<b>6</b>	<b>4</b>	<b>9</b>
<b>CLECs</b>	<b>144 (160)</b>	<b>40</b>	<b>49</b>	<b>17</b>	<b>9</b>	<b>21</b>	<b>8</b>

BellSouth's Change Request Logs do not reconcile. In this analysis 16 change requests not summarized in the logs are attributed to CLECs without further classification.

# BellSouth Change Control Process Compliance

## OLD "NEW" CHANGE REQUESTS

Change Request (Type - Status)	Request	Date Submitted	Status
ORD030200 001 (5 - N)	Ordering of UNEs on ASRs	3/1/00	Remains open at request of originators following denial and appeal
CR0012 (5 - N)	TAFI Functionality via ECTA	4/18/00	Remains open at request of originator following denial
CR0100 (4 - N)	DD calculation on deny/restore	7/7/00	Submitted as a defect, reclassified as a feature
CR0105 (5 - N)	RES ID requirement on xDSL orders	7/21/00	Conference calls being held with originator
CR0132 (5 - N)	Fielded Completion Notice	8/9/00	E-mails being exchanged
CR0166 (5 - N)	Cable ID Defect	9/20/00	Submitted as a defect, reclassified as a feature
CR0171 (5 - N)	CCP Document Changes	9/20/00	Version 2.1 published 2/9/01. Second ballot 3/1/00
CR0198 (5 - N)	Transaction size limit	10/11/00	Submitted as a defect, reclassified as a feature
CR0222 (5 - N)	Unknown USOCs	11/13/00	Awaiting BellSouth correction of CSR programming
CR0234 (5 - N)	Connect Direct fix	11/29/00	Awaiting BellSouth
CR0245 (5 - N)	Manual/Mech Flag	12/15/00	Appeal
CR0248 (5 - N)	Reqtype B for UNE-UNE Migration	12/15/00	Awaiting confirmation of claim that functionality exists.
CR0151 (5 - P)	Error Code Defect	9/1/00	Submitted as a defect, reclassified as a feature



## BellSouth Change Control Process Compliance

CR0177 (5 – P)	"D" as a valid response	9/25/00	Denied, appealed, became pending 12/11/00
CR0184 (5 – P)	View CLEC CSRs	9/28/00	Legal issue
CR0049 (6 – PC)	TNs on LENS bulk orders (BLS)	5/19/00	Open to BellSouth originator
CR0079 (6 – N)	TAG requires INIT on ReqType A (BLS)	6/12/00	Rejected – open to BellSouth originator
CR0080 (6 – N)	LESOG failing loop/port orders (BLS)	6/13/00	Validated, then rejected – open to BellSouth originator
CR0098 (6 – N)	DD intervals (BLS)	7/5/00	Rejected – open to BellSouth originator
CR0099 (6 – N)	MA'd SO's being dropped (BLS)	7/5/00	Not a defect – open investigation as feature
CR0210 (6 – N)	LENS error LNA=G with OTN (CLEC)	11/1/00	Validated – to be corrected in future release
CR0213 (6 – N)	Directory errors (CLEC)	11/2/00	Partially rejected – open investigation
CR0227 (6 – V)	Auto clarify in error (BLS)	11/21/00	Validated – to be corrected in future release
CR0237 (6 – V)	DD calculation for ReqType M (BLS)	12/8/00	Validated – to be corrected in future release

# BellSouth Change Control Process Compliance

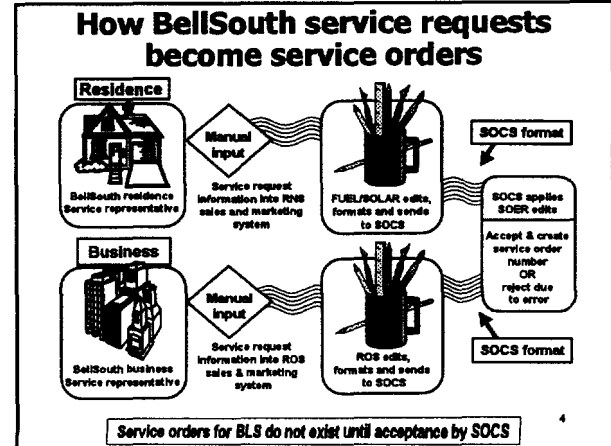
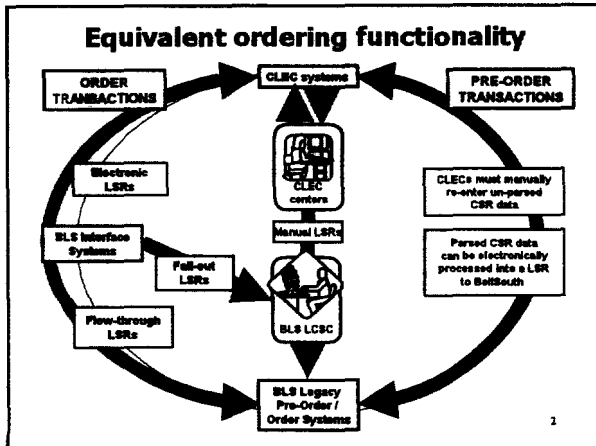
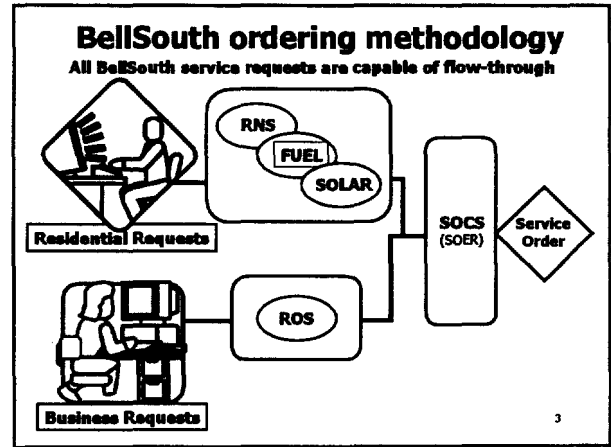
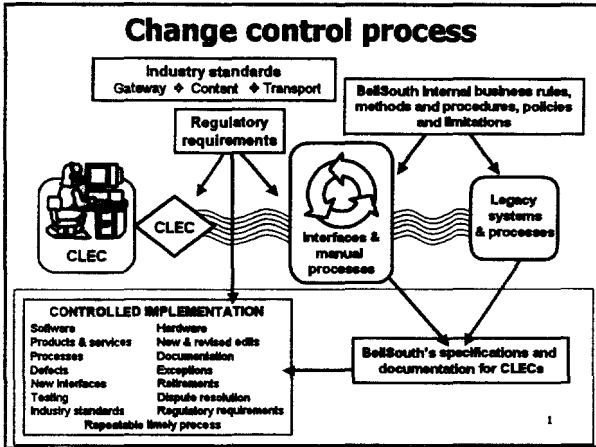
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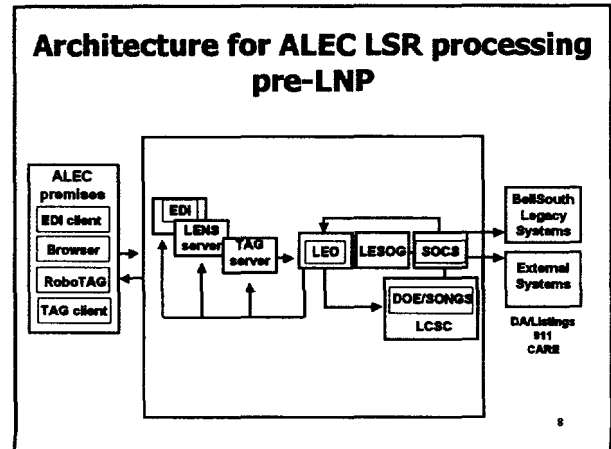
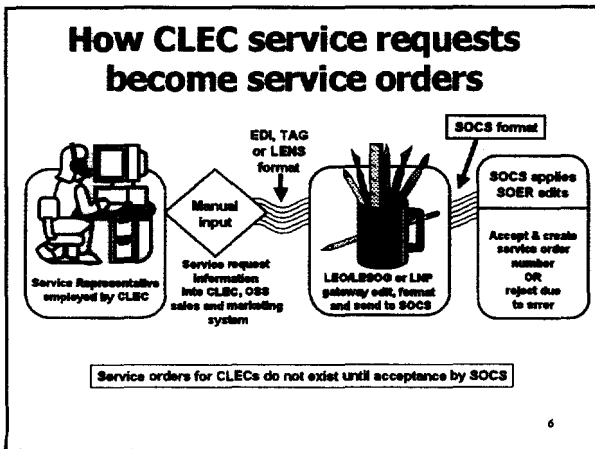
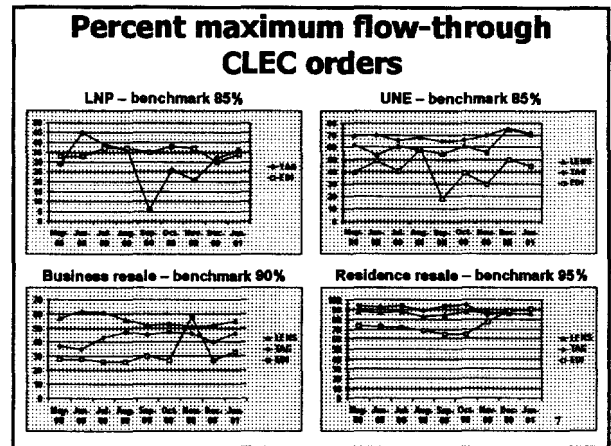
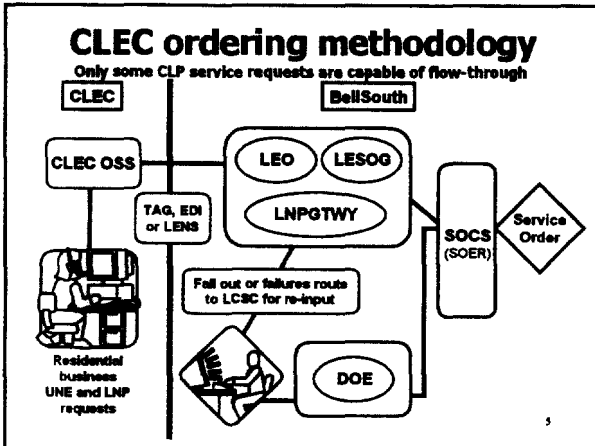
Change Request (Type - Status)	Request	Date Submitted	Status
CR0313 (4 – I)	Port/Loop DD interval change	2/12/01	Implemented on 2/25/01 as “expedited feature”
CR0279 (4 – I)	Additional LMU information	1/12/01	Implemented on 1/27/01
CR0247 (4 – I)	Reduce SL1 interval	12/15/00	Implemented 1/27/01
CR0226 (6 – I)	DD intervals (BLS)	11/20/00	Determined not to be a defect – implemented on 12/16 as “expedited feature”
CR0219 (4 – I)	Interval change for LNP loop	11/13/00	Implemented on 12/10/00
CR0216 (4 – I)	NP Order date for FOC	11/13/00	Implemented on 12/10/00
CR0203 (6 – I)	LESOG should allow manual handling instead of auto-clarify (BLS)	10/18/00	Determined not to be a defect – implemented on 11/18/00
CR0193 (4 – I)	TAG upgrade to UNIX 11.0	10/6/00	Implemented on 12/16/00
CR0191 (6 – I)	Suppress the premise visit indicator (BLS)	10/5/00	Determined to be a feature and was implemented on 10/9/00
CR0183 (4 – I)	TAG needs to display “TTRA”	9/28/00	Implemented on 1/6/01
CR0167 (6 – I)	Incorrect circuit number on FOC (BLS)	9/20/00	Determined to be a feature and was implemented on 10/14/00 and 10/21/00
CR0153 (2 – I)	Line Sharing	9/8/00	Implemented on 9/30/00
CR0116 (4 – I)	Premise visit indicator	7/28/00	Implemented on 9/30/00
CR0115 (4 – I)	Partial pre-order Query DDC	7/28/00	Implemented on 9/30/00

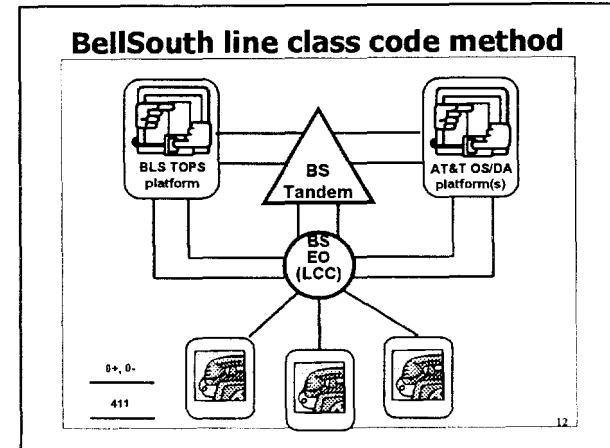
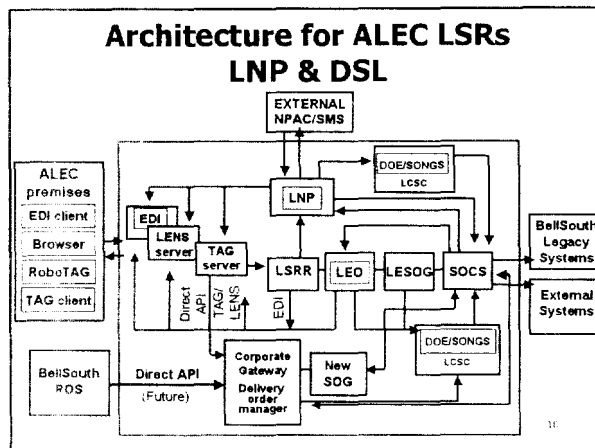
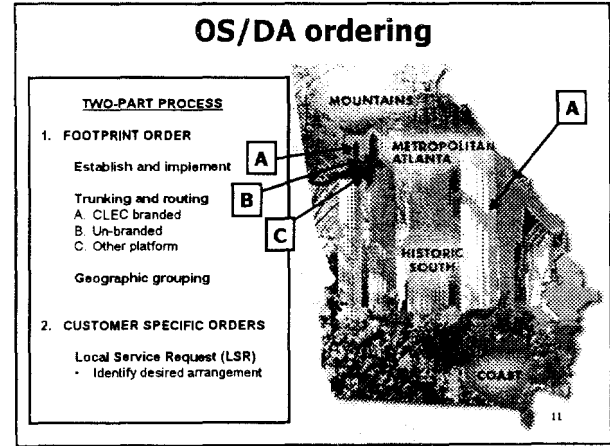
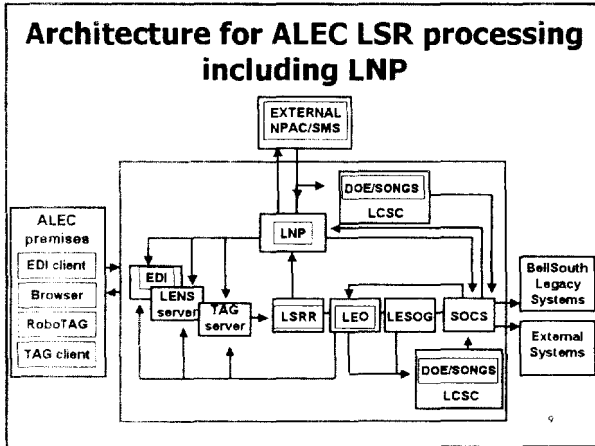
# BellSouth Change Control Process Compliance

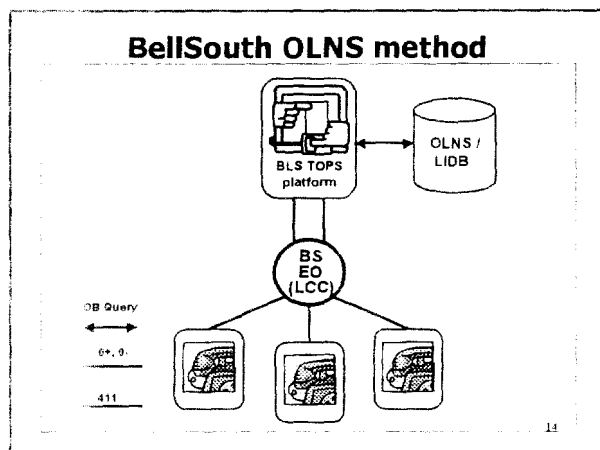
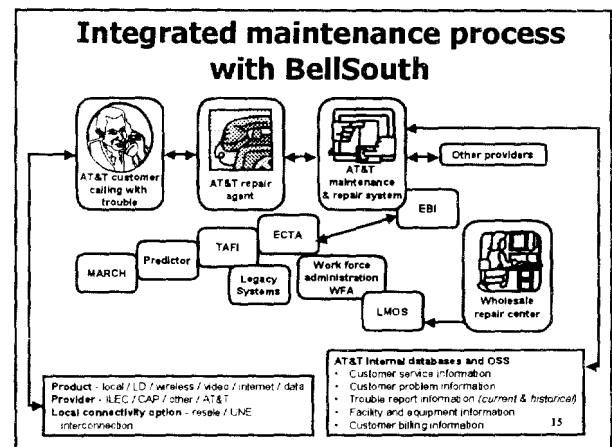
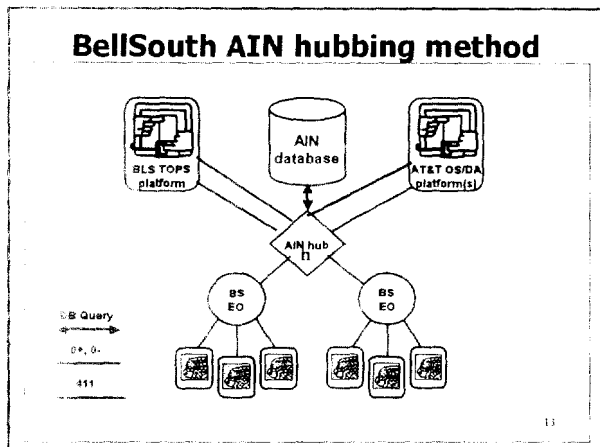
## BellSouth's Change Control Process Lacks Required Attributes

FCC Guidance	Status
CLEC Participation	CLECs have input however BellSouth retains a veto power over all decisions.
Procedure Documentation for <ul style="list-style-type: none"> <li>•Operational Changes</li> <li>•Technology Changes</li> <li>•Additional Functionality</li> <li>•Regulatory Mandates</li> <li>•Defect Correction</li> </ul>	CCP Document addresses each area however BellSouth's internal processes are being revised and will require revision of the CCP. BellSouth has not proactively provided CLECs with information on the changes to its internal processes or sought CLEC input for use in developing its new processes.
Prioritization and Stratification of Changes	The CCP contains an Outage Notification Process and 5 Change Request stratifications. CLEC prioritizations are overridden by BellSouth
Schedules for Notifications and Publication of Documentation	Currently in state of flux as BellSouth revises its internal processes. Intervals do not meet CLEC business needs. Confusion exists between "notification" and "documentation" schedule requirements.
A Testing Environment and Minimum 30 Day Test Window for New Releases	Does not exist in BellSouth. Development is underway for use with Release 9.4 scheduled for 6/30/01.
A Go/No Go Decision Process to Preclude Premature Implementation by the BOC	Process does not exist in BellSouth.
Versioning of Releases	Included in BellSouth process.
Memorialization of the Process, Including a Means by Which the Process can be Modified	The current CCP Document is Version 2.1.A. An update is expected on March 26. BellSouth retains and exercises veto power over CLEC consensus decisions to modify the process and implements modifications it desires unilaterally.
Dispute Resolution Process for CLECs, Specific to Change Management Disputes	The CCP Document contains a dispute resolution process however no regulatory body has adopted the document or established any specific processes to handle such disputes.
Followed Consistently Over Time	BellSouth regularly ignores CCP requirements.
Subject to Regulatory Oversight and Enforcement.	No regulatory authority in any BellSouth state has taken recognition of the CCP Document. The Georgia PSC Performance Plan contains penalties for late notifications and documentation but they cannot be executed as written.









# **BellSouth's Electronic CLEC Ordering Interfaces Rely Excessively on Manual Processing.**

**BellSouth interface design and operation routed 22% of all CLEC electronically submitted orders in January 2001 to manual processing.**

- CLEC orders are delayed.**
- CLEC's are unable to meet commitments to customers.**
- CLEC operating costs are increased.**



## **BellSouth's Electronic CLEC Ordering Interfaces Rely Excessively on Manual Processing**

**Percent of electronically submitted orders in January 2001 receiving manual processing in BellSouth's Local Carrier Service Center (LCSC)**

	LENS	TAG	EDI
LNP	-	64%	66% (72%)
UNE	29%	28%	55% (34%)
BUS	45%	54%	67%
RES	14%	10%	9%

**Failures, Designed Fallout and "Z" Status from BellSouth Flow-Through Reports**